

Remarks

Claims 1-31 are pending in this application. The Examiner has rejected claims 1-9, 13-24, and 28-31 as being anticipated under 35 U.S.C. 102(e) over U.S. Patent No. 6,952,743 to Ortega, III et al (hereinafter "Ortega"). Additionally, the Examiner has rejected claims 10-12 and 25-27 as being obvious under 35 U.S.C. 103(a) over Ortega in view of U.S. PGP No. 2002/0124007 to Zhao (hereinafter "Zhao").

A. Independent Claims 1, 19, and 31

Independent claims 1, 19, and 31 are rejected under 35 U.S.C. 102(e) as being anticipated by Ortega. Because the Examiner rejected independent claims 1, 19, and 31 under section 102(e) on the basis of Ortega, each element of these claims must be disclosed in Ortega. Ortega, however, does not disclose each element of independent claims 1, 19, and 31. Specifically, Ortega does not disclose a host information command issued to a device, the host information command including (1) a **host identifier** identifying the host that issued the command **and** (2) a **tag** identifying a reissued command or a tag field associating the data structure of the host information command to a host issued command.

The Specification of the present invention, in Figure 2, details a "Transfer Host Information" or THI command that contains **host identifier** information in its payload (bytes 8-15), as well as a **tag** (byte 2), which may be used as an identifier for an associated host issued command sent to a target device to facilitate atomic operations and command queuing of host issued commands. (Published Spec., [0034] and Fig. 2) It is clear from the Specification of the present invention that the host information command (or THI command) contains both a host identifier and a tag identifying a reissued command.

In contrast to the present invention, Ortega fails to disclose a host information command including **both** a host identifier and a tag or tag field. The Examiner points to Ortega

HOU02:1126819

as teaching that an initiatorHandle is the same as a host identifier and that the processing of an SCB into another protocol structure is the same as a tag identifying a reissued command. (Office Action, p.3) However, the Processing Control Structure (or SCB) of Ortega does not contain both a host identifier and a tag field, as required by the claims of the present invention. At best, the SCB contains an initiatorHandle, but it has not been shown to include a tag identifying a reissued command (in a second transport protocol). Additionally, the cited portions of Ortega disclose only that an SCB or SCSI control block may be processed into a transport protocol structure used by a storage device, but this fails to disclose a host information command including both a host identifier and a tag identifying a reissued command.

Because all elements of the independent claims are not taught by Ortega, Ortega cannot anticipate the independent claims. As such, Applicants request that the rejection of claims 1, 19, and 31 be withdrawn.

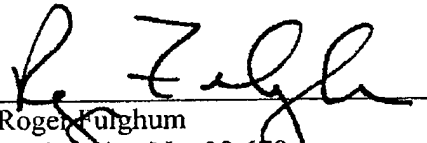
B. Dependent Claims 2-18 and 20-30

Dependent claims 2-18 and 20-30 will not be discussed individually herein, as these claims depend, either directly or indirectly, from an otherwise allowable base claims.

Conclusion

Applicants respectfully submit that the pending claims 1-31 of the present invention are allowable. Applicants respectfully request that the rejection of the pending claims be withdrawn and that these claims be passed to issuance.

Respectfully submitted,


Roger Fulghum
Registration No. 39,678

Baker Botts L.L.P.
910 Louisiana
One Shell Plaza
Houston, Texas 77002-4995
(713) 229-1707

Baker Botts Docket Number: 016295.1533

Date: January 7, 2008